

Statement of Michael Adler to the FCC, November 9, 2007, Seattle WA

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Commissioners,

NOV 16 2007

Federal Communications Commission
Office of the Secretary

I urge you from the bottom of my heart not to loosen or eliminate current media-ownership rules or take any other action that will enable big media owners to further consolidate their holdings and power.

American democracy depends upon diverse and free public media.

A free press should never be seen as just another money-making proposition. It has sacred responsibilities related to public education and the exercise of free speech and thought. These responsibilities should not be superceded by the profit-making motive.

Media consolidation is harmful to the nation.

Please stop the unwise and devastating road you are going down. The media are far too important to be controlled by fewer and fewer persons and corporations who are only interested in the profits that can inure to them. Drop the questions you are currently "examining." Go back to Washington and take no further action. Your existing rulings regarding increased media consolidations have been harmful enough. Please do not go further and confound the already difficult and dangerous situation you have created.

Sincerely,

Michael Adler

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06-121

Testimony for FCC Public Hearing on Media Ownership – Docket number 06-121

November 9, 2007

Steven Greenebaum

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I cannot speak with specificity to the question of further consolidating media ownership in this country. I feel sure that others have been and will be able to speak to that. I'm a minister, not a policy wonk. My concern is more general, and more basic. I think of the kids in my congregation, and kids all over the country. What kind of country, and what kind of future are we handing to them? The issue, for me, is access to the news. It's a small thing, among so many larger things that concern us deeply. But it is a small thing that we can actually do something about.

I've heard this called a partisan issue. I reject that. This is a democracy issue. I'm sure I needn't remind any of you that democracy depends on an informed electorate. To participate in a democracy, people must have access to the issues at hand, what they mean, and who they affect. Since we won't necessarily agree on what the issues are, what they mean and who they affect ... for there to be an informed electorate, we need multiple sources for our news.

This is not rocket science. This is basic. Government 101. And yet, even without the further action you now contemplate, the FCC has already allowed an alarming consolidation of media in the United States. We need LESS consolidation, not more. And to the idea that this is somehow a partisan issue, I would remind the Commission that it was the Republican President Theodore Roosevelt, who recognized the danger to

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democracy, to this country, of what were then known as Trusts. He took pride in being recognized as a "Trust Buster."

Don't make this partisan. Calling it that serves only to obscure what is really happening.

I ask you: can the financial power and well being of a few hugely rich mega-corporations be more important to this Commission than the well being of this country as a democratic republic? That's the issue. That's the issue and there's no getting around it. And if you put the financial interests of a few elite ahead of the health of this democracy and the need to have an informed electorate, then shame on you. SHAME on you!

Explain to your children and your grandchildren your priorities: if you can. Our constitution hoped "to secure the blessings of liberty to ourselves and our posterity." I ask you again, what kind of country will we handing over to our kids, and their kids?

It is said that my liberty to throw out my fist, stops at your nose. I suggest to you that the liberty of an elite few to control the media, stops, must stop, at the need for an informed electorate to have sufficient diversity in the sources of their news.

Thank you for your time and attention.

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**Written testimony of
DIANA KRAMER
Associate Publisher, The Business Report and Renton Magazine**

**Before the
FEDERAL COMMUNICATIONS COMMISSION**

06-121

Related to Competitiveness, Localism and Diversity

**NOVEMBER 9, 2007
SEATTLE, WASHINGTON**

Chairman Martin, and members of the Commission:

Thank you for coming to Seattle to hear what we have to say on this important topic.

The newspaper and broadcast cross-ownership rules should not be loosened. Consolidation undermines and inhibits competitiveness, localism and diversity. It puts our citizens at greater risk from groupthink and ignorance.

I have three main points:

1. We need more competition among news outlets, not less. From a business perspective, it makes sense to leverage and repurpose content generated by one outlet onto another. We see television weather people and commentators featured in newspapers, or magazine or television content online. But if there is no restriction to cross-ownership, eventually there will be one original report that will be published or aired across a market or region. Is there really such a shortage of important local news in Seattle that the airtime needs to be filled out with local news from Portland? While I agree that we should know what is going on around us, the unfortunate truth is that most local broadcast news is so shallow already that I am not enlightened or educated by watching shallow or sensational broadcasts from another major market's TV reporters.

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If greater cross-ownership is allowed, we will see more pool reporting. Without competition, there is no financial reason for a news conglomerate to spend money to report and interpret events. It becomes profit for the shareholders.

Television news used to be the prestigious hallmark of a broadcasting company. Those days are gone. Now news segments are part of the entertainment and the typical newscast contains less news than is printed on a single page of a newspaper. For this the public gives up its airwaves?

Corporate consolidation brought us AOL-Time-Warner, an absolute giant of a company. Was the public more informed and enlightened? We experienced repurposed content, not additional reporting. We read and heard additional disclaimers about ownership, not more insight. Even the market turned its back on the conglomerate, and stockholder value was destroyed.

2. Diminished involvement in local issues concerns me. I'm honored to serve on this panel with Frank Blethen. His family has been a good steward to this community, and his influence extends far beyond it. He cares deeply about the quality of reporting, and allocates substantial and precious resources to thoughtful and aggressive reporting; as well as to community service. His is a unique and powerful voice.

The president of the local broadcasting company is similar to Frank in commitment to the local community, although I don't know him personally. My point is that a media conglomerate operating significant broadcast and print outlets in the Seattle market would not have multiple presidents. There would be only one – and our community's volunteer and leadership pools would be poorer because of it.

Leaders lost through consolidation affects communities across the country. This phenomenon is not unique to media, although I have experienced first-hand the effects of consolidation of the non-daily newspapers in Washington State. In the mid 1980s, individual publishers living and working in their communities owned most of the state's community newspapers. In 2007 the dynamic has changed dramatically, with one company owning the majority of the non-daily newspapers in Western Washington. Consequently there are fewer newspaper voices heard across the state, less editorial leadership, less independent thought.

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We can never go back to the way things were. But neither should we lower the barrier to further consolidation, particularly as it relates to such a limited public resource as airwaves.

Further, healthy competition among local media outlets results in better coverage of people and issues that otherwise would go unreported, benefiting people and issues without a regular and consistent voice. More media outlets contribute to great diversity of voices heard throughout and beyond the community.

One analogy is shopping choice for consumers. Bellevue Square is as nice a shopping experience as you'll find anywhere in the country. You'll find pretty much what you find in other upscale markets. But for an iconic Seattle experience, visit Pike Place Market. A burgeoning smorgasbord of local flavor and offerings, representing our diverse culture, filling customers' needs on a local or even micro-market level. It's how I think local media should be.

Those favoring further consolidation will say people today have plenty of news choices, thanks to the Internet and cable. I don't consider re-runs of re-runs quality news coverage. Few blogs or independent Web-sites (those not affiliated with a professional news organization) have accurate, sourced content. Which brings me to my third point, the revenue piece.

3. Reduced competition through consolidation creates an economic barrier to entry, as media conglomerates package markets to national advertisers. It gives the conglomerate pricing power as it relates to advertising – lower costs per thousand to attract advertisers and prevent competition, and higher costs per thousand to drive profits once the market is dominated. Anti-competitive? Certainly. But this would be nearly impossible for a small niche player to prove.

The field is not as wide-open as one might think. Local, original content is expensive, regardless of whether the distribution is printed or electronic. In nearly every instance, advertising pays the bills, even for subscription products. Without a proven revenue model, Web-sites and blogs come and go, further disenfranchising those who rely on them for news and information.

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Without a revenue source, the idea of diversity and alternative viewpoints is theoretical.

Looking ahead, I fear for our nation when a few conglomerates control the airwaves and what I read in my newspapers and magazines. I believe that more insightful reporting and analysis of how we treat others, here and abroad, and the very real challenges of living in a truly global society would better serve our citizens.

Media consolidation allows our government to even more fully control the public's access to information, because it reduces the competition among reporters to find new information and untold stories. And licensing of fewer airwaves-based players gives the government a hammer that could be used to further control what we read and hear. Seem preposterous? Things I thought impossible 10 years ago are certainly true today: secret courts, torture, failed policies, dangerous products. Expecting more and better coverage from fewer, non-competitive conglomerates is counter-intuitive.

In closing, I think I am a typical American. I do not want one company to provide all my food. I do not want one company to provide all my fuel. I do not want one company to provide all my local news. Please do not change the newspaper-broadcast cross ownership rules.

Thank you.

FCC commissioners,

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Do not consolidate media any further.
We need more regulation of the media,
not less. Most americans get ~~their~~ news
from broadcast television first, not from
the internet or any other sources. Lack of
diversity in media ownership threatens democracy
and denies citizen the right to be informed
through the use of our public airways. Protect
the constitution and reregulate media in
the United States of America. Now!

Thank you,

Mark Holland

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TO THE FCC, RE. ITS 2006 PROPOSED RULEMAKING ON MEDIA OWNERSHIP:

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I wish to express my strong opposition to any weakening or elimination of the FCC's media ownership regulations. The rules, including ownership caps on TV and radio, and a ban on local newspaper/broadcast cross-ownership, must remain strong because they provide vital protection to local accountability, competition and diversity in our media.

The FCC has been entrusted with safeguarding these media values because our democracy depends on access to diverse voices, answerable to the public interest - not economic motivations alone. Recent trends favoring corporate media concentration have taken a heavy toll on independent and local voices in media, minority media ownership and viewpoint diversity. This trend should be reversed, not extended.

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NAME Joe Aprile EMAIL ADDRESS joseph.aprile@comcast.net
ADDRESS 8145 29th SW CITY Seattle, WA STATE WA ZIP 98126

TO THE FCC, RE. ITS 2006 PROPOSED RULEMAKING ON MEDIA OWNERSHIP:

06-12 /
I wish to express my strong opposition to any weakening or elimination of the FCC's media ownership regulations. The rules, including ownership caps on TV and radio, and a ban on local newspaper/broadcast cross-ownership, must remain strong because they provide vital protection to local accountability, competition and diversity in our media.

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NAME Julia Chase EMAIL ADDRESS jchase7@juno.com
ADDRESS 8145 29 SW, Seattle CITY Seattle STATE WA ZIP 98126
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06-12 / ①
Hello FCC. I Am Seth Schromen-Wawrin. I come from Port Angeles, WA, a city west of Seattle about 3 hours. Isolated between mountains and British Columbia, Canada, this area has its own particular culture.

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Unfortunately, little of the local culture and affairs get expressed in the media there. Radio rights are primarily owned by Seattle based stations, where Port Angeles is at the extent of their range and blocked by mountains. Or. airwaves are covered by Canadian stations, which are enjoyable for their support of diverse and local content. However we should not have to rely on Canadian stations for OUR radio.

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Similarly, local television and print are afterthoughts of large, non-local corporations who are not so interested in investing in reporting on our rural life's affairs.

Simply put, the free market approach to media has left a vacuum in this area. We are off the profitability map. The result we

~ Seth Schromen-Wawrin

375 Westridge Rd Port Angeles WA 98363

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receiver is false-hearted media. The media outlets in Port Angeles do not delve into the local affairs. Our struggles, politics, successes, and questions go relatively unexplored by the distant media providers.

As this case of Port Angeles shows, what we do not need in this country is a further consolidation and homogenization of the media industry. What we need is political and financial support for local media.

Thank you,

Seth Schromen-Wawrin

To whom it may concern.

06-121

I Am here to oppose the growth of Already large Corporate media groups becoming larger.

We have Anti-Trust laws to prevent such growth to help prevent corruption.

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These laws have been ignored for too long.
The "clear channels" of the world must be down sized!

Our public Air waves belong to the people,
not the Religious Right, not "clear channel," not
Rupert Murdoch.

The Airwaves must be open, fair, and balanced.

Sincerely



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My name is Rachel Rubinstern. I am against the relaxation of cross-ownership regulations and for the strengthening of independent locally produced media.

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I have had a wonderful opportunity in a local, ~~radio~~ radio station, KBCS. This station features music and volunteer produced news and discussion shows. KBCS trains volunteers of all walks of life to be critical producers and consumers of news. It features voices I don't see or hear in mainstream media. It features my voice and issues that I care about. With further consolidation, these voices will be further marginalized. A small number of media conglomerates cannot possibly reflect the cultural richness of the Puget Sound area. Therefore, there should be more not less opportunity for small, local, and independent groups to produce programming that reflects their issues and their needs. Local media is made by ~~A~~ and for the people, not for profit or a corporate bottom line. Local media gives air time to minority and marginalized voices. Local media features local music. Local media don't hear otherwise. Local media gives people like me the

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changes to participate in mst.

Consolidation reduces these opportunities and
~~also~~ reduces the number of people that can be
involved. I call on you, commissioners, to allow
all of us the chance to be a part of
creating a rich, vibrant, and diverse media.
Don't relax the cross-ownership regulations.

OK

Rachel Rubinstein

Rachel Rubinstein

943 24th Ave, Apt 2

Seattle, WA 98122

alumhc@hotmail.com

Friday, Nov. 9, 2007

06-121

This is the first step that governments take before a political coup! If you at the F.C.C. really want to destroy our democracy, you will accept this proposal! Historically the countries and governments that have consolidated the media into conglomerates for profit & greed have become dictatorships. Please do not let this happen to our wonderful America!

Thank you.

J. E. Peterson
Bellevue, WA

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November 4, 2007 - ~~Re: H2o FCC Hearing~~

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NOTE of Intercept Federal Communications Commission
Office of the Secretary the composition of
the FCC Commission as represented
here - Very white, Very male. 06-121

A key element of a strong
democracy is free and independent
media and news reporting - which
"we the people" will not get
if the media is allowed to
consolidate more than it
already has. We must not allow
our news media to be owned by
large corporations as we are
seeing more and more. As this
happens our democracy is
eroded more and more.

Susan David
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Honorable Commissioners of the FCC

Local consolidation across media is a bad idea that will be detrimental to local diversity of news, opinion, and the arts. Citizens need local election coverage, local political & community news, local public safety information, and local accountability. Please hold the line on ^{media} consolidation rules to keep our communities and our democracy strong.

Sincerely,

Diane W. Alota

11001 NE 145th St.

Kirkland WA 98034

Nov November 9, 2007

Seattle WA FCC Hearing

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QUANTITY VERSUS QUALITY:

Why do Americans have to make a trade-off in radio broadcasting?

Federal Communications Commission
Office of the Secretary

06-121

-- submitted by Timothy Tattan, Seattle Washington -- ttattan@yahoo.com

I might sound like an 'old timer radio geek,' when I remind us that the old "performance versus promise" requirements of the FCC for a broadcast license renewal. It was a powerful stimulus for broadcasters to compete for how much public service they would actually provide on their airwaves. They had to earn the right to continue to use a frequency every few years.

Now, with the Commission granting new frequencies by auction, the haves get to have it all, since the licenses usually go to the highest bidder.

The proposal to further loosen ownership restrictions brings up a whole series of connected issues. And it's not without plenty of precedent already operating on the air right now across the United States.

For example, if the unregulated marketplace of just a few licensees really worked to represent a community's interests, why does famously secular and left-leaning Seattle have at least eleven full-time religious and right-wing commercial radio stations on the air right now on the AM band? And yet only one commercial station operates in Seattle with a so-called progressive political format? Certainly it's not because of the demographics of the Seattle market!

It has to be an issue with who is operating the stations. Will Salem or Bonneville ever provide programming by and for the area's Christian liberals? Muslims and Buddhist listeners? Gay and lesbian citizens?

Of course not! It's their mission to control what we hear to suit their owners' political and social agenda, and to make a big profit the only way they know how.

Job opportunities for professional broadcasters and radio journalists are at an all time low, since the number of potential commercial radio employers is now no more than three or four in most major markets -- thanks to the level of license consolidation we already are operating under. Given the reality of the egos in both broadcasting talent and management, this means a lot of potential good radio is not going to happen under the current system that gives one regional manager control over a third of the signals in a market.

New media are opening up new outlets, but few of these outlets can provide a living wage and health benefits. And issues related to internet distribution still threaten to stymie these opportunities in the USA.

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Low Power FM can also serve as an outlet for hobbyists and minority interests. But not at the expense of holding the licensees to full power facilities accountable for broadcasting in the public interest, convenience, and necessity. The whole public.

Now that broadcasters are being given the opportunity to triple their signals with HD radio on the facilities they already control, just how many signals will the Clear Channels and Citicasters and Cumuluses and Disney need in each market to be happy? HOW MUCH IS ENOUGH for these guys?

And the promise of potential news programming from a newly merged newspaper-TV-Radio combo really points out the sad reality that the current radio ownership system won't even perform at the minimal level of public service that it used to 20 years ago - because it doesn't have to anymore.

And if you still think a mega media conglomerate is a good idea, look at Dayton Ohio, where Cox Communications has been granted an exemption to the cross ownership rules for decades. They operate the daily newspaper, the largest TV, FM and AM stations in the market, among others. And they engaged in a deliberate smear campaign against the NPR station in their market when it tried to professionalize and its news audience started to compete with their own. Want to see ugly competition and media rivalries get even uglier all across the country? Just follow the lead the FCC's exemptions have already set in Dayton.

- -

Shouldn't the advent of HD multicasting be the reason for REDUCING the number of licenses any one entity can hold in a market? Shouldn't this open up opportunities for new parties to get into operating radio facilities that the big guys complain they can't make a profit at? Why aren't there any stations operated by the many South and East Asian citizens of metro Seattle? Native American stations? Stations with an authentic voice, geared to the interests of working women? The high tech community? Integrating immigrants into the larger community, while celebrating their culture and languages?

How about using the regulatory power of the FCC to grant licenses for a few more specialty stations with large enough signals to reach their core audiences, who are spread out over our metro sprawl? Not just a promise of a low power signal someday in a suburb.

Vancouver BC, is demographically very similar to Seattle, and has several such stations - including some licensed on the US side of the border aimed at Canada. Why isn't that kind of radio variety happening in Seattle?

Is the broadcast spectrum still public property in the United States?

Hometown radio stations, with their familiar personalities and local news departments, have been re-licensed to larger broadcasters, who have shut them down, and been allowed to move their facilities into nearby, and not so nearby, major markets. The local station everybody relied on is now yet another generic "hit music" station 30 miles away. So much for training grounds for young broadcasters, and so much for the public interest in those cities.

It used to be that the FCC was how we ensured at least a minimal level of public service and accountability. In the past ten years or so, it seems the Commission is beholden more to the interests of large investors, and deliberately makes it difficult for the public to have a say in policy and license renewals.

Even die-hard market force believers suggest that -- at a minimum -- the FCC should monitor and regulate issues of signal interference. Yet when I provide evidence to the FCC field office in Redmons, Washington that Seattle AM stations on 630, 710, 880, 1000 have boosted their sideband interference enough to blot out other nearby signals that we used to receive clearly from nearby Vancouver and Victoria -- I was told by the local field office -- whose phone number, by the way, is unpublished -- that they would not deal with my complaint. I had to deal with it myself with the folks in DC. When I called 1-888-TELL-FCC, after waiting on hold for 13 minutes, I was transferred to an anonymous voicemail box to leave my complaint.

I was even told by a switchboard operator at the FCC headquarters in Gettysburg that I had to contact the offending broadcasters directly, rather than contact the FCC about the signal jamming these stations are causing. I don't think that's an honest way for the FCC to deal with violations of international treaty obligations for Canadian border stations.

If a large commercial broadcasting conglomerate is complaining about their inability to make a sufficient profit from a pack of fullpower FM and AM signals - then reassign some of those licenses to a non-profit or local organization - or to an eager newcomer to the industry. One that will be able to put public service before shareholder demands, and that will be satisfied with a relatively modest profit - as they try out new programming.

Otherwise, it's just making room for more "classic rock and less talk" in a country that desperately needs media that helps to build communities, civic discourse, and to help us understand our place in the world.

LPFM technical issue:

By the way, the FCC has already licensed hundreds of low power FM stations on second adjacent frequencies in major markets across the country. Licensees such as Calvary Chapel of Twin Falls Idaho, Educational Media Foundation of Sacramento California, American Family Radio of Tupelo Mississippi, Pensacola Christian Church, and other right wing fundamentalist religious organizations found a way to sneak in a national radio service by erecting hundreds 10 and 100 watts facilities, many with high tower heights, all across the country.

Those facilities are causing signal loss to the outer coverage areas for many full power non-commercial stations. One of them even made up a city name of "Cumminsville, Ohio" to licensed as 'first service' for what turns out is only the name on a Cincinnati neighborhood post office -- smack dab in the middle of the Cincinnati city limits.

And these new 'national' religious broadcasters are often targeting the frequencies of nearby NPR affiliates to silence their voices in suburban and adjacent city areas.

These facilities were put on thru a big loophole while the Commission argued about the effect of second adjacent low power FMs. Will the Commission now have the courage to decommission many of those facilities that unfairly compete with locally-based religious stations for listeners and donor support? Or to reassign those facilities to local low power applicants?

It might be ironic that the quality of public service and choices available to listeners have diminished as the number of licensed radio services increases. FCC policies seem blind to the realities of signal propagation, since it grants licenses assuming a flat terrain and does not account for signal realities of hills, mountains, and large bodies of water. Recent policies have diminished FM coverage areas, particularly in the non-commercial band, and made eliminated nighttime DX listening to many major stations from out of town.

Why not regulate the satellite radio band to open it up to both subscription and non-subscription services? FCC regulation, not proprietary hardware, will stimulate this new service if there's room for free "national" services, along with scrambled XM and Sirius channels, on one band.

-- Timothy Tattan, Seattle, Washington
ttattan@yahoo.com

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11/9/07

I vehemently oppose any further allowances,
permits, or encouragement of more media ownership,
control, management being consolidated in the
hands of a few corporations.

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Our freedoms, our ~~own~~ informed civic engagement
and the flow of diverse sources of information
would be even further threatened. We NEED
more, not fewer, media owners. ~~at m~~

Sincerely,

Lisa Dekker

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